



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA FACSIMILE (724) 932-3097 and
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

FEB 19 2010

Mr. Daniel Lashinsky
Director of Safety
Combined Systems, Inc.
388 Kinsman Road
Jamestown, Pennsylvania, 16134

Re: Combined Systems, Inc.

Dear Mr. Lashinsky:

The purpose of this letter is to confirm that on March 9, 2010 at 8:00 a.m., the U.S. Environmental Protection Agency ("EPA") will conduct an inspection of the facility located at 388 Kinsman Road in Jamestown, Pennsylvania. This inspection will be conducted pursuant to the Emergency Planning and Community Right-to-Know Act ("EPCRA") and the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"). EPA's primary focus during this inspection will be to gather information regarding Combined Systems, Inc.'s compliance with Sections 302, 303, 311, and 312 of EPCRA for its facility, located in Jamestown, Pennsylvania.

The inspection will be conducted by [Non-responsive based on revised scope] a contractor to EPA under the Enforcement Support Services and Community Involvement Support Contract. [Non-responsive based on revised scope] is designated by the Administrator of the U. S. EPA to conduct inspections pursuant to EPCRA and CERCLA. [Non-responsive] representatives are authorized to have access to Confidential Business Information and have signed a Non-Disclosure agreement regarding such information.

The scope of the inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviewing and taking statements; reviewing of chemical manufacturing, importing, processing; and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to gather information relative to compliance with EPCRA for the Jamestown, Pennsylvania facility.

The inspectors will review and may obtain copies of the following documents:

- Calendar years 2007, 2008, and 2009 on-site inventories of all chemical substances and mixtures used, stored, processed and/or manufactured at each facility. Include, in this summary, chemical names with Chemical Abstracts Service ("CAS") number and maximum quantities on-hand at any one time.
- A copy of the notifications to the State Emergency Response Commission ("SERC"), or the Local Emergency Planning Committee ("LEPC"), indicating that an Extremely Hazardous Substance ("EHS") is stored in quantities equal to or greater than the Threshold Planning Quantity ("TPQ"), as required by EPCRA §302.
- A copy of any correspondence to the SERC, or the LEPC, verifying an identified Facility Emergency Coordinator ("FEC"), as required by EPCRA §303.
- Copies of Material Safety Data Sheets ("MSDSs"), or the list of MSDS chemicals, your facility submitted to the appropriate SERC, LEPC, and local Fire Department for those chemicals present in quantities which meet or exceed the applicable TPQ or threshold level, as required by EPCRA §311.
- Copies of Tier II Report forms submitted to the appropriate SERC, LEPC, and local Fire Department for those chemicals subject to EPCRA §311 at your facility during calendar years 2007, 2008, and 2009, as required by EPCRA §312.

To facilitate the inspection process and minimize the time the inspectors need to be at your facility, please have these documents ready at the time of the inspection. In addition, please have available a site plan or facility diagram, as well as a written general description of your business operations including: Standard Industrial Classification ("SIC") Code; North American Industry Classification System ("NAICS") Code; year business began operations; year and state of incorporation; calendar year 2009 estimated annual revenue; number of employees; branch locations; headquarters or parent offices; and company officials (e.g., President, CEO, Plant or Branch Managers). Please provide this information on company letterhead or other documentation which clearly indicates your company name, address, city, and state.

You may, if appropriate, pursuant to the procedures set forth at **40 C.F.R. § 2.203(b)**, assert a business confidentiality claim covering all or part of the information requested above. Information covered by such a claim will be handled by EPA in accordance with the procedures set forth in **40 C.F.R. Part 2, Subpart B**. If no claim of confidentiality accompanies the information requested herein when it is received by EPA, it may be made available to the public by EPA without further notice to the company.

On April 11, 2000, EPA issued its revised final "Small Business Compliance Policy". This policy implements, in part, the Executive Memorandum of Regulatory Reform (60 Federal

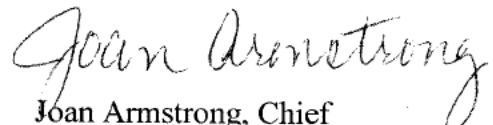
Register 20261, April 26, 1995) and Section 323 of the Small Business Regulatory Enforcement Fairness Act ("SBREFA"). Attached with this letter you will also find a SBREFA Information Sheet which will provide you with a variety of compliance assistance tools to assist you in complying with federal and state environmental laws. In addition, EPA has an informative website for Small Business Compliance and Enforcement, including the SBREFA Information Sheet, at: <http://www.epa.gov/compliance/incentives/smallbusiness/>

If at all possible, please provide the inspectors with a convenient location (*e.g.*, office, conference room) to conduct the inspection and complete their paperwork. The inspectors may need to have access to a telephone. Please also be prepared to have a knowledgeable operations/maintenance facility representative available to accompany the inspectors on a tour of your facility.

The inspectors will provide you with a partial list of chemicals subject to SARA Title III, a guide to SARA Title III, and instructions to assist you in preparing documents necessary to determine compliance.

If you have any questions, or if for security or clearance reasons you need any additional information pertinent to the individuals who will be conducting the subject inspection, please contact Michelle Price-Fay, EPCRA Coordinator, at (215) 814-3397.

Sincerely,


Joan Armstrong, Chief
Oil and Prevention Branch

Attachments:
Recommended format for on-site inventories
EPCRA Fact Sheets
SBREFA Information Sheet

cc: Case File (03, PA, 2010, 022)
Non-responsive based on revised scope
Craig Yussen (3WC33)

Attachment 1

Recommended format for on-site inventories

Please provide a list of all the hazardous chemicals, mixtures, and/or EHSs that you had on-site during calendar years 2006, 2007, and 2008, and for which the Occupational Safety and Health Administration ("OSHA") requires that you have a Material Safety Data Sheet ("MSDS"). Please provide quantities for each of these substances for each year as well. Mixtures should be broken down into components by percentages. Include the Chemical Abstracts Service ("CAS") numbers (if available) for all hazardous chemicals. The table below lists examples and a recommended format.

CHEMICAL FROM ALL PRODUCTS ON-SITE	% COMPOSITION	CAS NUMBER	2006 MAX AMT (LBS.)	2007 MAX AMT (LBS.)	2008 MAX AMT (LBS.)
Pure Chemical OR Chemical Name from product					
Sulfuric acid	100%	7664-93-9	12,500 (total)	12,000 (total)	13,000 (total)
Xylene		1330-20-7	25,500 (total)	22,000 (total)	13,300 (total)
from yellow paint #2	25%		8,000	9,000	7,150
from degreaser A12	35%		8,500	8,400	2,150
pure	100%		9,000	4,600	4,000
Toluene		108-88-3	35,600 (total)	37,000 (total)	37,000 (total)
from degreaser A12	50%		9,300	9,300	9,300
from yellow paint #2	20%		9,200	9,200	9,200
from orange paint #5	5%		8,100	8,100	8,100
pure	100%		9,000	10,400	10,400